

answers and all of the documents were supposed to be provided. Without delivering on their specious promises.

On March 28, 2024, the Zekaria Defendants produced a total of 18 pieces of paper, and 16 of the documents produced were meaningless junk. Of the total 27 pages of documents that have been produced so far, only 4 pages were relevant and material.

Attached to this Reply as Exhibit “D” is a true and correct copy of the email dated March 28, 2024, sent by undersigned counsel for plaintiff, to counsel for the Zekaria Defendants, outlining the numerous deficiencies and omissions in the still-far-from-completed and woefully insufficient document production of the Zekaria Defendants. Said defendants have not even provided written responses to the Document Requests – they only have produced a handful of mostly meaningless documents, and continual promises that the additional responsive documents will be forthcoming.

And to date, the Zekaria Defendants still have failed and refused to produce any answers, let alone full and complete verified answers without objection, to the Interrogatories served on them, back in October of 2022.

In sum, it is NOT sufficient for the Zekaria Defendants to claim that plaintiff’s Motion to Compel Discovery and for Sanctions from them should be denied because they intend, at some unspecified time in the future, to produce all of the required discovery. They were served with plaintiff’s discovery requests in October of 2023, and to date they still have not provided plaintiff with their full and complete verified answers, together with their production of all of the responsive documents, which now are almost five months overdue. This Court should enter the Order submitted with plaintiff’s Motion, granting the Motion and compelling the Zekaria Defendants to produce all of the long overdue answers to the discovery requests and all of the responsive

documents.

Respectfully submitted,

LIGHTMAN & MANOCHI

BY: /s/ Gary P. Lightman
GARY P. LIGHTMAN, ESQUIRE
GLENN A. MANOCHI, ESQUIRE
Identification Nos. 28529 & 64223
600 W. Germantown Pike, Suite 400
Plymouth Meeting, PA 19462
Tel. No. 215-760-3000
garyl@lightmanlaw.com
gmanochi@lightmanlaw.com

Date: April 1, 2024

Attorneys for plaintiff

EXHIBITS TO REPLY

<u>EXHIBIT</u>	<u>DESCRIPTION</u>
-----------------------	---------------------------

<u>“D”</u>	3/29/24 Email to Patrick Healey, Esquire, counsel for the Zekaria Defendants, setting forth the deficiencies in minimal documents produced by Zekaria Defendants
-------------------	--

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the date shown below he caused to be served a true and correct copy Plaintiff's Reply in further support of its Motion to Compel Discovery From the Zekaria Defendants and for Sanctions via ECF, and/or email upon the following:

Seth Laver, Esquire
Goldberg Segalla
1700 Market Street, Suite 1418
Philadelphia, PA 19103-3907
slaver@goldbergsegalla.com
jross@goldbergsegalla.com

Samuel Gross
a/k/a Shlomo Gross
78 Buckminster Road
Rockville Centre, NY 11570
charltonholdinggroupllc@aol.com
publicdiamonds@gmail.com
Scg1212@gmail.com
Samrosinc@icloud.com

Gary Weiss
437 1st Avenue
Elizabeth, NJ 07206
wgary4109@gmail.com
monipair@aol.com

Patrick Healey, Esquire
Cathleen Kelly Rebar, Esquire
Rebar Kelly
Blue Bell Executive Campus
470 Norristown Road, Suite 201
Blue Bell, PA 19422
phealey@rebarkelly.com
crebar@rebarkelly.com

LIGHTMAN & MANOCHI

BY: /s/ Gary P. Lightman
GARY P. LIGHTMAN, ESQUIRE

Date : April 1, 2024

Attorneys for Plaintiff